

Mr. Dennis Dean
Modern Hard Chrome of Indiana
3550 Canal Street
East Chicago, IN 46312

Re: **089-13904-00385**
Notice-only change to
MSOP 089-11566-00385

Dear Mr. Dean:

Modern Hard Chrome of Indiana was issued a permit on July 19, 2000 for a stationary hard chromium electroplating and polishing operation. A letter notifying the Office of Air Quality of a request to correct the date of the initial compliance stack test and its associated pressure drop, was received on February 12, 2001. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

Modern Hard Chrome of Indiana has stated that Condition D.1.7 incorrectly indicates the date of the initial compliance stack test as November 22 and 23, 1999 and that the pressure drop is also incorrectly stated as 3.18 inches across the composite mesh pad system. The correct date is April 29, 1997 and the correct pressure drop across the composite mesh pad system is 2.16 inches.

The proposed changes shall be incorporated into the permit via a Notice Only Change pursuant to 326 IAC 2-6.1-6(d)(2) which states that changes to a Minor Source Operating Permit (MSOP) that are minor administrative changes such as a change in the name, address, or telephone number of any person identified in a permit or a change in descriptive information concerning the source or emission unit or units shall be a Notice Only Change.

Condition D.1.7 shall be therefore be amended as follows with bold type indicating additional language and strike-out type indicating deleted information.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tanks, identified as Tank #1 and Tank #2, was performed on ~~November 22 and 23, 1999~~ **April 29, 1997**.

During the performance test conducted on ~~November 22 and 23, 1999~~ **April 29, 1997**, it was determined that the average pressure drop across the composite mesh pad system was ~~3.18~~ **2.16** inches of water and the average outlet chromium concentration is less than 0.002 mg/dscm.

- (b) The Permittee is not required to further test tanks, identified as Tank #1 and Tank #2, by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of the tanks, identified as Tank #1 and Tank #2, the packed bed scrubber/composite mesh pad system device or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF Initials

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
East Chicago Local Agency
Northwest Regional Office
Air Compliance Section Inspector - Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Modern Hard Chrome of Indiana, Inc.
3550 Canal Street
East Chicago, Indiana 46312**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No. MSOP 089-11566-00385	Date Issued: July 19, 2000
First Notice Only Change No.: 089-13904-00385	Affected Pages: 18 and 19
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- (3) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.
 - (4) Perform washdown of the composite mesh-pads in accordance with manufacturers recommendations.
 - (5) A standardized checklist to document the operation and maintenance criteria for tanks, identified as Tank #1 and Tank #2, the air pollution control device, the add-on air pollution control device and the monitoring equipment.
 - (6) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
 - (7) A systematic procedure for identifying malfunctions and periods of excess emissions of tanks, identified as Tank #1 and Tank #2, the air pollution control device, the add-on air pollution control device and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).
 - (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks, identified as Tank #1 and Tank #2, the air pollution control device, the add-on air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.
 - (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.
 - (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of tanks, identified as Tank #1 and Tank #2, or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

- (a) A performance test demonstrating initial compliance for tanks, identified as Tank #1 and Tank #2, was performed on April 29, 1997.

During the performance test conducted on April 29, 1997, it was determined that the average pressure drop across the composite mesh pad system was 2.16 inches of water and the average outlet chromium concentration is less than 0.002 mg/dscm.

- (b) The Permittee is not required to further test tanks, identified as Tank #1 and Tank #2, by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of the tanks, identified as Tank #1 and Tank #2, the packed bed scrubber/composite mesh pad system device or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)] [40 CFR 63.343(c)]

- (a) Pursuant to 40 CFR 63.343(c)(3) and 63.343(c)(1)(ii), when using a packed bed scrubber in conjunction with a composite mesh-pad system to comply with the limit specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated within ± 1 inch of water column of the pressure drop value established during the initial performance test, or within the range of compliant values for pressure drop established during multiple performance tests.
- (b) Tank operation or operating time is defined as that time when a part is in the tank and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen (15) minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen (15) minutes, that time between plating the two parts is considered operating time.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements [326 IAC 2-6.1-5(a)(2)] [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the packed bed scrubber/composite mesh pad system and monitoring equipment to document that the inspection and maintenance required by Conditions D.1.6 and D.1.7 have taken place. The record can take the form of a checklist and should identify the following:
 - (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and